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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA ex rel. PEGGY THORNTON, Relator,

and

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PEGGY THORNTON,

Plaintiff.

VS.

PORTOLA DEL SOL OPERATOR, LLC, a foreign limited-liability company; TMIF II PORTOLA, LLC, a foreign limited liability company; APARTMENT MANAGEMENT CONSULTANTS, LLC, a foreign limited liability company, and RENE RICHARDSON, as AGENT of PORTOLA DEL SOL OPERATOR, LLC,

Defendants.

Case No.: 2:21-cv-01123-APG-BNW

STIPULATION AND ORDER TO EXTEND DEADLINE FOR DEFENDANT TMIF II PORTOLA, LLC TO RESPOND TO THE JOINT **MOTION TO APPROVE** SETTLEMENT AND DISTRIBUTION **OF SETTLEMENT FUNDS**

[First Request]

Plaintiff Peggy Thornton ("Thornton"), Defendants Apartment Management Consultants, LLC and Rene Richardson (collectively, "AMC"), and Defendant TMIF II Portola, LLC ("TMIF"), by and through their undersigned attorneys, and pursuant to LR IA 6-1, submit the following Stipulation to Extend Deadline for TMIF to Respond to the Joint Motion to Approve Settlement and Distribution of Settlement Funds ("Motion") up to and including February 5, 2025. In support of the Stipulation, the parties state the following:

1. TMIF's opposition to Thornton and AMC's Motion is currently due January 22, 2025. 1

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	2.	Thornton and AMC's reply in support of their Motion is currently due on January 29
2025.		

- 3. Counsel for TMIF has scheduling conflicts and therefore seeks a reasonable extension of fourteen (14) days, until February 5, 2025.
 - 4. Counsel for Thornton and AMC have agreed to the requested extension.
- 5. This is the first request to extend the deadline for TMIF to file its opposition to Thornton and AMC's Motion.
- 6. This request for an extension of time is not intended to cause any undue delay or prejudice to any party.

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